

RM-10352: Petitioners' Response to Comments of Stahl, K8MR (January 23, 2002)

K8MR:

The petition to limit wide band, i.e. SSB, operation in the 1800-1843 KHz segment suffers from a serious flaw. Under this petition and the ARRL Band Plan used as the model, CW operation is specifically permitted above 1843 KHz during periods of high usage or emergencies. There is no reciprocal permission for SSB usage below 1843 KHz during similar conditions of high usage or emergencies.

Petitioners' Response:

Per FCC Part 97.305(a): "An amateur station may transmit a CW emission on any frequency authorized to the control operator." This regulation applies to ALL amateur frequencies, not just 160 meters.

K8MR:

Such flexibility has worked well during SSB operating events. In practice most contest operation, CW or SSB, takes place below about 1845 KHz, regardless of mode. (Although this is not true for 3 weekends per year when there are contests exclusively for 160 meter operation. These events may occupy 75 KHz during the two CW only events, and nearly the entire band during the one SSB only event.) The use of frequencies below 1843 KHz during other SSB events causes much less disruption to those not participating in contests, who typically operate SSB above 1850 KHz. On the other hand, those interested in intercontinental communications are very often the same people operating SSB in the proposed affected frequency range during contest periods. They are still using the discussed segment for international communications, just with a different mode.

Petitioner's Response:

Any SSB operation below 1843 kHz is in conflict with the ARRL Bandplan recently revised in July. Furthermore, the previous ARRL Bandplan did not allow SSB below 1840. None of the 3 IARU Regional Bandplans allow SSB below 1840. Most recently, during the North American SSB QSO Party Contest held January 19-20, strong local SSB stations below 1840 were interfering with reception of weak European CW stations operating in the Hungarian DX Contest in the same area at the same time. While most of these may have been in ignorance, the following posts on the OH2AQ Packetcluster document an episode by Patrick Collins N8VW (who commented negatively on this Petition on January 23) and his response to the complaint by N4XD as follows:

Originator	kHz	Report	Comment	UTC	Date
N4XD	1836.0	N8VW	cw portion of band Tnx	K0356	20 Jan 2002
N8VW	1800.0	N4XD	contest time buddy	0406	20 Jan 2002

<http://oh2w.kolumbus.com/dxs/qin.html> (enter N8VW and select "Any Column")

While we believe contests fulfill a vital role in amateur radio and we both have placed highly in 160 meter contests numerous times, we do not believe contest participants have privileged rights to the use of modes on frequencies that conflict with established ARRL and IARU bandplans. In particular, SSB contest participants render the usual narrowband frequencies below 1840 useless for their duration. The same is not true for CW contests which rarely have stations above 1870, thus allowing wideband modes ~130 kHz of operation. This problem is totally unique to 160 meters because no mode segmentation exists between wideband and narrowband modes as does on every other amateur HF band. Adoption of RM-10352 will eliminate these conflicts by allowing the same self-enforcement amateurs follow on all other HF bands. We also believe adoption will cost taxpayers and the FCC less to enforce than the current voluntary bandplan which is not consistently followed as documented above.

References:

Current ARRL Voluntary 160 Bandplan:

<http://www.arrl.org/FandES/field/regulations/bandplan.html#160m>

IARU Regional Bandplans for all 3 IARU Regions:

http://www.iaru-r2.org/hf_e.htm

K8MR:

There is a potential conflict of interest element involved with this petition. One of the petitioners, Mr. Briggs, has in recent months built a vacation home with a significant amateur radio installation in Prince Edward Island, Canada. Should this petition be granted, in operating under Canadian regulations from that location he would be permitted to use SSB on those frequencies that would be prohibited to United States amateurs, sparing him from the considerable interference described in the petition.

Petitioners Response:

On January 24, Mr. Robert Nash VE3KZ and Chair of the RAC HF Band Planning Committee posted the following message the Topband reflector:

<http://lists.contesting.com/pipermail/topband/2002-January/014132.html>

N6RK wrote:

*>This all sounds good, but it seems to me
>it just creates a VE phone band. Why should
>we expect VE's to honor a voluntary band plan
>on 160 when US stations won't?*

Gentlemen

Just a little view from North of the Border from the Canadian Band Planning group. We have been watching with interest the changes in the ARRL and the possibility of FCC sub bands on 160. In the Fall I queried a fair selection of active Canadian Top Banders and the feeling was that in light of the ARRL plan they would like to make the Canadian Plan compatible with the new ARRL plan.

Since the Canadian plan is voluntary, there is still some possibility of what Rick is worried about but 160 is quite a different band in Canada from 80, 40 and 20 where we believe, for good reasons, that we need some separate phone space. Maintaining national communications farther north, specially with declining CW, is a major national concern on those bands. This is not true on 160 where the activity is homogeneous with the US, and where there is plenty of phone room at the top of the band..

Our revisions to our 160m plan will be on the web shortly and will offer changes making it compatible as far as phone use is concerned.

73 Bob VE3KZ

ve3kz@rac.ca

Chair: RAC HF Band Planning Committee

Although the Canadian bandplan will be voluntary, Mr. Briggs as VY2ZMM will honor it in his SSB contest operations from Prince Edward Island. We are especially pleased that the RAC has chosen to synchronize their bandplan with the ARRL and RM-10352.

Sincerely,

Jeff Briggs K1ZM and Bill Tippet W4ZV